

UNITED STATES DISTRICT COURT
DISTRICT OF NORTH DAKOTA

United States of America, <p style="text-align: center;">Plaintiff,</p> vs. Jovan Marquis Harris, <p style="text-align: center;">Defendant.</p>	Case No.: 3:16-cr-272 <p style="text-align: center;">MOTION FOR EXTENSION OF TIME TO FILE WRITTEN BRIEFS IN SUPPORT OF THE MOTIONS FOR ACQUITTAL AND A NEW TRIAL</p>
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The Defendant, Jovan Marquis Harris (“Mr. Harris”), by and through his attorney, Kenneth J. Kohler, hereby moves the Court for an order granting an extension of time in which to file written Briefs in Support of the previously filed Motions for Acquittal and for a New Trial. On May 14, 2018, Mr. Harris was found guilty by a jury of Count 1 - Conspiracy – resulting in death of J.W.L., resulting in serious bodily injury of T.P.M. and resulting in serious bodily injury of M.S.M; Count 2 – Distribution of heroin, resulting in the death of J.W.L.; Count 3 – Distribution of heroin, resulting in the serious bodily injury of T.P.M.; Count 5 – Distribution of heroin, resulting in the serious bodily injury of M.S.M.; Count 6 - Distribution of heroin; and Count 7 – Distribution of heroin. On May 16, 2018, Mr. Harris, through his counsel, filed a Motion for Acquittal pursuant to Rule 29 of the Federal Rules of Criminal Procedure and a Motion for a New Trial pursuant to Rule 33 of the Federal Rules of Criminal Procedure. The Federal Rules of Criminal Procedure prescribe a fourteen (14) day time period to make the aforesaid Motions, and the Motions have been made. Counsel for Mr. Harris, however, seeks additional time to supplement these Motions with Briefs that will further articulate the bases for the Motions and the legal arguments in support thereof.

Counsel for Mr. Harris further seeks to obtain the jury trial transcript to further the legal arguments to be presented for these Motions. Accordingly, pursuant to Rule 45(b) of the Federal Rules of Criminal Procedure, Mr. Harris respectfully requests an extension, from today's date, with which to file a Brief in support of these Motions.

Dated this 16th day of May, 2018.

VOGEL LAW FIRM

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